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AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
DEPUTY
BY

Magistrate Judge Brian A. Tsuchida

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHELLE RENEE HUGHES,

a/k/a Jose Trinidad
a/k/a Steven Carey
a/k/a Alex Anderson
a/k/a J.M.
a/k/a A.E.

Defendant.

CASE NO. MJ19-256

COMPLAINT for VIOLATION

18 U.S.C. § 1001(a)(2)

18 U.S.C. § 1028A

BEFORE the Honorable Brian A. Tsuchida, United States Magistrate Judge,
Seattle, Washington,

The undersigned complainant, being duly sworn alleges:

COUNT ONE
(False Statements)

On or between February 25, 2019 and March 5, 2019, within the Western District of Washington, MICHELLE R. HUGHES, willfully and knowingly made materially false, fictitious, and fraudulent statements and representations on a form that was a matter within the jurisdiction of the Federal Aviation Administration, an agency of the executive

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UNITED STATES ATTORNEY
700 STEWART STREET, SUITE 5220
SEATTLE, WASHINGTON 98101
(206) 553-7970

1 branch of the Government of the United States, to wit: his representations on Form 8050-
2 dated February 25, 2019 that MICHELLE R. HUGHES is the owner of a Piper PA-44-
3 180T airplane bearing serial number 44-8107055.

4 All in violation of Title 18, United States Code, Section 1001.

5

6 **COUNT TWO**
7 **(Aggravated Identity Theft)**

8 On or between February 25, 2019 and March 5, 2019, within the Western District
9 of Washington, MICHELLE R. HUGHES, knowingly used, without lawful authority, a
10 means of identification of another person, to wit: the name and purported signature of
11 J.M., a real person, during and in relation to felonies listed in Title 18, United States
12 Code, Section 1028A(c), to wit: False Statements in violation of Title 18 United States
13 Code 1001, as charged in Count 1 herein.

14 All in violation of Title 18, United States Code, Section 1028A.

15

16 **COUNT THREE**
17 **(False Statements)**

18 On or between April 26, 2019 and May 3, 2019, within the Western District of
19 Washington, MICHELLE R. HUGHES willfully and knowingly made materially false,
20 fictitious, and fraudulent statements and representations on a form that was a matter
21 within the jurisdiction of the Federal Aviation Administration, an agency of the executive
22 branch of the Government of the United States, to wit: his representations on Form 8050-
23 1 dated April 16, 2019 that MICHELLE R. Hughes is the owner of a Cessna 510 airplane
24 bearing serial number 510-0095.

25 All in violation of Title 18, United States Code, Section 1001.

26

27

28

COUNT FOUR
(Aggravated Identity Theft)

On or about between April 26, 2019 and May 3, 2019, within the Western District of Washington, MICHELLE R. HUGHES knowingly used without lawful authority a means of identification of another person, to wit: the name and purported signature of A.E., a real person, during and in relation to felonies listed in Title 18, United States Code, Section 1028A, to wit: False Statements in violation of Title 18 United States Code 1001, as charged in Count 3 herein.

All in violation of Title 18, United States Code, Sections 1028A.

The undersigned, Ly Tran, complainant being duly sworn, states:

1. I am a Special Agent with Homeland Security Investigations (HSI) currently assigned to the Border Enforcement Security Task Force in Seattle, Washington. I have been employed by HSI, formerly known as Immigration and Customs Enforcement, since May 2005. Prior to my employment with HSI, I was a Parole Officer for the State of Washington Department of Corrections for approximately four years.

2. I have completed the Criminal Investigators Training Program and Immigration and Customs Enforcement Special Agent Training at the Federal Law Enforcement Training Center in Glynco, Georgia. I have also completed the Drug Enforcement Administration Basic Drug Enforcement Training. I am familiar with investigations of drug trafficking organizations, methods of importation and exportation, distribution and smuggling of controlled substances, and financial and money laundering investigations. I have participated in numerous investigations involving organizations trafficking in controlled substances, including, ecstasy, marijuana, and cocaine which, have resulted in the arrest of drug traffickers and seizures of controlled substances and currency. I have participated in the execution of search warrants for controlled substances; and have personally been involved in the seizures of controlled substances.

1 Additionally, I have participated in investigations involving human trafficking, financial
2 crimes, murder for hire, and cybercrimes.
3

4 **PURPOSE OF AFFIDAVIT**

5 3. This affidavit is submitted in support of a criminal complaint and arrest
6 warrant charging that from on or about February 25, 2019 through May 3, 2019 in the
7 Western District of Washington, MICHELLE R. HUGHES, knowingly and willfully
8 violated Title 18, United States Code, Section 1001-- False Statements and knowingly
9 violated Title 18, United States Code, Section 1028A – Aggravated Identity Theft.
10

11 **SUMMARY OF INVESTIGATION**

12 **Piper Seminole Aircraft**

13 4. On May 10, 2019, I received information from United States Department of
14 Transportation (USDOT) – Federal Aviation Administration (FAA) that an individual
15 identified as MICHELLE R. HUGHES submitted an aircraft Bill of Sale to the
16 Washington State Department of Transportation (WSDOT) - Aviation Division.
17 WSDOT then contacted the previous owner of the aircraft, J.M., to confirm cancellation
18 of J.M.’s Washington State aircraft registration. Mr. McMahon stated he did not sell his
19 aircraft. WSDOT then contacted the FAA and provided the FAA with a Bill of Sale
20 submitted by MICHELLE R. HUGHES. According to the FAA, MICHELLE R.
21 HUGHES also submitted forged documents to the FAA Aircraft Registry to include a:
22 Bill of Sale containing Mr. McMahon’s forged signature and an Aircraft Registration
23 form listing MICHELLE R. HUGHES as the new owner of the aircraft.

24 5. Law enforcement record checks revealed MICHELLE R. HUGHES has
25 prior convictions for numerous fraud charges. In 2011, MICHELLE R. HUGHES, using
26 the aliases a/k/a CHRIS LEIGH ZALER, a/k/a JOSE TRINIDAD GONZALES, a/k/a
27
28

1 ALEX LEIGH ANDERSON, a/k/a STEVEN DAVID CAREY, and a/k/a A.N.A¹., was
2 arrested and convicted in the Western District of Washington Court for violations of 18
3 USC 1542 – False Statements in Application for Passport, and 18 USC 1028A –
4 Aggravated Identity Theft. A criminal history check shows that MICHELLE R.
5 HUGHES was convicted in Washington State and North Carolina for forgery and identity
6 theft.

7 6. Upon reviewing the documents I received from the FAA, I learned the
8 following: On February 25, 2019, an Aircraft Bill of Sale, Form Number 8060-2, Federal
9 Aviation Administration - Department of Transportation was filed. The form listed
10 MICHELLE R. HUGHES as the “purchaser” with the address 153 SW 332nd Pl, Apt
11 3106, Federal Way, WA 98023. The form listed J.M. as the “seller” of the aircraft. The
12 aircraft was listed as a Piper model number PA-44-18OT, serial number 44-8107055, tail
13 number N8377L. The purchase price for the aircraft was listed as \$115,000.00 USD.
14 The form was received/filed with the FAA on March 05, 2019.

15 7. Also on February 25, 2019, an Aircraft Registration Application, Form
16 Number 8050-1, Federal Aviation Administration - Department of Transportation was
17 filed. On the form, MICHELLE R. HUGHES is listed as the owner of the aircraft Piper
18 PA-44-18OT, serial number 44-8107055, tail number N8377L. MICHELLE R.
19 HUGHES reported an address of 153 SW 332nd Pl, Apt 3106, Federal Way, WA 98023.
20 The form contained the following jurat: “I hereby certify that the information provided
21 herein and in any attachments to the application for aircraft registration is true, accurate
22 and correct to the best of my knowledge and belief. I understand that the information
23 provided by me will be relied on by the FAA administrator in his/her determination of
24 qualification for aircraft registration. I understand that whoever, in any matter within the
25 jurisdiction of any department or agency of the United States, knowingly and willfully
26 falsifies, conceals or covers up (by any trick, scheme or device) a material fact or who
27

28 ¹ A.N.A. was an alias used by HUGHES from a prior fraud scheme.
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1 makes any false, misleading or fraudulent statements or representations or entry, may be
2 fined up to \$250,000 or imprisoned not more than five (5) years or both (18 U.S.C.
3 Section 1001 and 3571). I understand that should I intentionally provide any inaccurate or
4 false information, registration of the subject aircraft may be revoked." A signature of
5 Michelle R. Hughes appears in box 1 underneath the jurat with a sign date of February
6 25, 2009.

7 8. It appeared that the Aircraft Bill of Sale and Aircraft Registration
8 Application forms, both filled out on February 25, 2019, were mailed together to the
9 FAA Aircraft Registration Branch, P.O. Box 25504, Oklahoma City, OK, 73125. The
10 date the envelope was mailed is illegible. The sender's name and address are typewritten
11 on the envelope as "Ms. Michelle Hughes, 702 South 14 Street, Tacoma, WA, 98495." A
12 Google search revealed this address is a nativity house/homeless shelter. The FAA
13 received and then filed the forms on March 5, 2019

14 9. On March 14, 2019, an Aircraft Registration Application, Form Number
15 8050-1, Federal Aviation Administration - Department of Transportation was filed. On
16 the form, MICHELLE R. HUGHES is listed as the owner of the aircraft Piper PA-44-
17 18OT, serial number 44-8107055, tail number N8377L. MICHELLE R. HUGHES
18 reported an address of 153 SW 332nd Pl, Apt 3106, Federal Way, WA 98023 and a
19 telephone number of (206) 479 0256. The form contained the following jurat: "I hereby
20 certify that the information provided herein and in any attachments to the application for
21 aircraft registration is true, accurate and correct to the best of my knowledge and belief. I
22 understand that the information provided by me will be relied on by the FAA
23 administrator in his/her determination of qualification for aircraft registration. I
24 understand that whoever, in any matter within the jurisdiction of any department or
25 agency of the United States, knowingly and willfully falsifies, conceals or covers up (buy
26 any trick, scheme or device) a material fact or who makes any false, misleading or
27 fraudulent statements or representations or entry, may be fined up to \$250,000 or
28 imprisoned not more than five (5) years or both (18 U.S.C. Section 1001 and 3571). I

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1 understand that should I intentionally provide any inaccurate or false information,
2 registration of the subject aircraft may be revoked." A signature of Michelle R. Hughes
3 appears in box 1 underneath the jurat with a sign date of March 14, 2009.

4 10. The Aircraft Registration Application form was mailed to FAA Aircraft
5 Registration Branch, P.O. Box 25504, Oklahoma City, OK, 73125, on March 15, 2019.
6 The sender's name and address are typed on the envelope as listed as "Ms. Michelle
7 Hughes, 702 South 14 Street, Tacoma, WA, 98495." A Google search revealed this
8 address is a nativity house/homeless shelter. The FAA received and filed the forms on
9 March 20, 2019.

10 11. I also reviewed Form 8050-1B Department of Transportation – Federal
11 Aviation Administration Aircraft Registration Renewal Application dated October 3,
12 2018. The form listed J.M. as the registered owner of the aircraft. I also reviewed
13 several other documents from the FAA showing previous owners of the above-mentioned
14 aircraft.

15 12. On May 15, 2019, I conducted surveillance at the Cove Apartments, 153
16 SW 332nd Pl, Apt 3106, Federal Way, WA 98023. I did not see any activity at the
17 residence. I then contacted Mia Bowman, Leasing Consultant of the Cove. I showed her
18 a picture of MICHELLE R. HUGHES. Bowman stated MICHELLE R. HUGHES was a
19 current resident of the apartment complex. BOWMAN confirmed MICHELLE R.
20 HUGHES and HUGHES'S wife, Cheryl Saad, live at apartment 3106, 153 SW 332nd Pl,
21 Federal Way, WA 98023. Bowman stated MICHELLE R. HUGHES is assigned car port
22 number 397, located across from the apartment. According to Bowman, MICHELLE R.
23 HUGHES reported owning a 2011 Audi, grey in color, bearing Washington license plates
24 11490A. I verified that the vehicle was parked in car port 397. Record checks revealed
25 this vehicle is registered to C & C Sales, 153 SW 332nd Pl, Apt 3106, Federal Way, WA
26 98023.

27 13. On May 16, 2019, I spoke to Ed Stewart, Manager, Law Enforcement
28 Assistance Program, FAA. Mr. Stewart confirmed that the FAA Aircraft Registry listed

1 MICHELLE R. HUGHES as the owner of the above aircraft. Mr. Stewart agreed that the
 2 Bill of Sale and Aircraft Registration Application submitted by MICHELLE R. HUGHES
 3 were fraudulent. Mr. Stewart acknowledged that the FAA Aircraft Registration takes all
 4 documents at face value. FAA Aircraft Registration does not question anything unless
 5 the applications are incorrectly completed or contain missing information. Mr. Stewart
 6 told me that he has seen other similar cases. After the aircraft is registered on paper, the
 7 new (fraudulent) owner then sells the aircraft to an unsuspecting buyer, who pays money
 8 but does not receive the anticipated airplane in return. The new (fraudulent) owner then
 9 absconds with the money.

10 14. On May 20, 2019, I observed a post on
 11 <https://www.aerotrader.com/listing/1981-Piper-SEMINOLE-5007509340>. According to
 12 its website, "AeroTrader.com is a leading aviation site for buyers and sellers. Aero
 13 Trader's inventory includes new and pre-owned airplanes, helicopters, and aviation
 14 related products and services. Sellers benefit from an easy online inventory management
 15 tool, as well as access to metrics and email reporting. With a trusted network of dealers
 16 and private sellers from across the country, Aero Trader is a destination site of aviation
 17 enthusiasts." Trader Interactive is the online classifieds marketplace and marketing
 18 software solutions provider to commercial and recreational dealers. Anyone can get on
 19 the website to create an account to advertise. Its mission is to bring buyers and sellers
 20 together.

21 15. The May 20, 2019 post is as follows: "I own a 1981 Piper PA-44-180T. I
 22 have proof of ownership in hand from the FAA. The Plane located at Shelton, WA. The
 23 plane is well cared for and want to find it a new home. I can even accept trades,
 24 negotiated on the price." The post included the same picture of the aircraft previously
 25 sent to me by the FAA. The post contained additional details, including the tail number.
 26 The seller was listed as a "Private Seller" in Federal Way, Washington. The seller asked
 27 for \$125,000.00 to sell the aircraft.

28

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1 16. I responded to the poster in an undercover capacity. I also provided the
 2 poster my telephone number. On the same date, I received an email from Aerorader.com.
 3 The email stated, "The Piper is still for sale. What is your offer? We can arrange
 4 financing. If I finance directly to you without a lender, the price will be 125,000. I can
 5 do down payment of 40,000 and monthly of 2,000. I am in Federal Way. Michelle.
 6 Please email me at michelle44450@gmail.com."

7 17. I also received two text messages from telephone number (253) 241-0723.
 8 The first text message asked me to confirm my undercover identity. The second text
 9 message stated, "This is Michelle about the 1981 Piper Seminole."

10 18. Through text messaging, MICHELLE R. HUGHES offered to arrange "co-
 11 ownership" of the aircraft with me. When I asked for clarification, MICHELLE R.
 12 HUGHES responded "You own 50% and I own the other 50%." When I asked if I could
 13 check out the aircraft, MICHELLE R. HUGHES stated, "You can check it out anytime
 14 you want to. The door is unlocked. The plane is at Shelton, WA airport. Feel free to fly
 15 it to Kent wa airport. My car wont make it to Shelton."

16 19. On June 8, 2019, MICHELLE R. HUGHES sent the following text
 17 message, "I can meet you today because I have a client that has the whole 62,500 to give
 18 me today. I know you only wanted to put down 1,000 towards it. Can yo afford to pay
 19 2,500 a month for your part of the plane. I will need to meet you because I need copy of
 20 id, proof of address, social security number for the financial part and so it can be put on
 21 your credit report. If I don't get something today, I will have to sell to someone else.
 22 You can evencome up with several grand. Do you have any collateral to give me that is
 23 valued at 62,500. Can you try to raise more than 1,000? Can you borrow from bank or
 24 family member?"

25 20. I conducted a search of telephone number (253) 241 0723 in open source
 26 public records databases. Records checked revealed the telephone number was
 27 associated with multiple individuals - including MICHELLE R. HUGHES at 153 SW
 28

1 332nd Pl, Apt 3106, Federal Way, WA 98023. On the Rental Application, MICHELLE
2 R. HUGHES also listed this number as the main contact telephone number.

3 21. On May 28, 2019, I interviewed J.M., the owner of the 1981 Piper PA-44-
4 180T. J.M. stated he did not sell his aircraft nor does he intend to sell it. J.M. stated he
5 does not know or associate with MICHELLE R. HUGHES. When I showed J.M. a
6 photograph of MICHELLE R. HUGHES, Mr. McMahon stated he did not recognize
7 MICHELLE R. HUGHES.

8 22. J.M. stated he did not sign any Aircraft Bill of Sale (FAA Form 8050-2)
9 recently. J.M. stated that his signature did not appear on the Aircraft Bill of Sale that was
10 previously submitted to the FAA by MICHELLE R. HUGHES. J.M. further stated that it
11 was not his signature on the Aircraft Bill of Sale when I showed the document to him.
12 J.M. told me that he signed his name in two different ways and described the signatures. I
13 observed that the signature on the Aircraft Bill of Sale did not appear to be either of the
14 way J.M. described signing his name. In comparison of the signatures, J.M. stated that
15 when he signed his name, the letter "M" of his last name was more pointed and vertical.
16 I observed that the letter "M" of the signature on the above-mentioned Aircraft Bill of
17 Sale was more rounded.

18 23. J.M. stated he still has custody of the aircraft. He showed me his Aircraft
19 Registration Certificate bearing identification number 353089, issued by the WSDOT. It
20 shows the aircraft was registered on February 18, 2019 with an expiration date of
21 December 31, 2019. Mr. McMahon stated that because of the incident, he put an anti-
22 theft device on his aircraft to protect his property.

23 **Cessna Citation Mustang Aircraft**

24 24. On May 29, 2019, I received several emails from A.E., who stated
25 MICHELLE R. HUGHES filed a fraudulent Aircraft Bill of Sale and fraudulent Aircraft
26 Registration Application for his airplane, a Cessna Citation Mustang bearing registration
27 number N102DS and serial number 510-0095. The papers were filed with the FAA
28 Aircraft Registry on May 3, 2019.

1 25. Upon reviewing the documents I received from A.E., I learned the
 2 following: on April 26, 2019, an Aircraft Bill of Sale, Form Number 8060-2, Federal
 3 Aviation Administration - Department of Transportation was filed. On the form,
 4 MICHELLE R. HUGHES is listed as the "purchaser" with the address 153 SW 332nd Pl,
 5 Apt 3106, Federal Way, WA 98023. A.E. was listed as "seller" of the aircraft. The
 6 aircraft was listed as a Cessna 510 bearing registration number N102DS and serial
 7 number 510-0095. The purchasing price was listed as \$1,500,000.00 USD. The form
 8 was received/filed with FAA on May 3, 2019.

9 26. On the same date, an Aircraft Registration Application, Form Number
 10 8050-1, Federal Aviation Administration - Department of Transportation was filed. On
 11 the form, MICHELLE R. HUGHES was listed as the owner of the aircraft Cessna 510,
 12 registration number N102DS, serial number 510-0095. MICHELLE R. HUGHES
 13 reported an address of 153 SW 332nd Pl, Apt 3106, Federal Way, WA 98023 and a
 14 telephone number (206) 479 0256. The form contained the following jurat: "I hereby
 15 certify that the information provided herein and in any attachments to the application for
 16 aircraft registration is true, accurate and correct to the best of my knowledge and belief. I
 17 understand that the information provided by me will be relied on by the FAA
 18 administrator in his/her determination of qualification for aircraft registration. I
 19 understand that whoever, in any matter within the jurisdiction of any department or
 20 agency of the United States, knowingly and willfully falsifies, conceals or covers up (buy
 21 any trick, scheme or device) a material fact or who makes any false, misleading or
 22 fraudulent statements or representations or entry, may be fined up to \$250,000 or
 23 imprisoned not more than five (5) years or both (18 U.S.C. Section 1001 and 3571). I
 24 understand that should I intentionally provide any inaccurate or false information,
 25 registration of the subject aircraft may be revoked." A signature of Michelle R. Hughes
 26 appears in box 1 underneath the jurat with a sign date of April 26, 2009.

27 27. The Bill of Sale and registration form were mailed together to the FAA
 28 Aircraft Registration Branch, P.O. Box 25504, Oklahoma City, OK, 73125. The date of

1 mailing, per the envelope, is April 29, 2019. The sender's name and contact information
2 is listed in handwriting on the envelope as "Michelle Hughes, 153 SW 332 Pl, Federal
3 Way, WA, 98023. It appeared that FAA received and filed the forms on May 3, 2019.

4 28. On the same date, I interviewed A.E. via phone about the incident. A.E.
5 stated he did not sell his aircraft nor does he intend to sell it. A.E. stated he does not
6 know or associate with MICHELLE R. HUGHES.

7 29. A.E. stated he did not sign any Aircraft Bill of Sale (FAA Form 8050-2)
8 recently. A.E. stated it was not his signature on the Aircraft Bill of Sale. I compared
9 A.E.'s true signature on other legal documents and the signature on the Aircraft Bill of
10 Sale. The signatures do not match.

11 30. A.E. affirmed that he still has custody of the aircraft. A.E. sent me an email
12 with a document attachment indicating his aircraft, Cessna 510, registration number
13 N102DS, serial number 510-0095, was registered on December 9, 2018 with an
14 expiration date of December 31, 2019. The aircraft is registered with WSDOT under
15 registration number 349508.

16 31. On June 5, 2019, A.E. sent me an email and advised that he received
17 notification from Miss Jade Hofeldt, an aircraft broker with Jet Aviva. According to
18 A.E., MICHELLE R. HUGHES contacted Miss Hofeldt and offered to sell Mr.
19 Enriquez's airplane for \$2.5 million dollars. On June 6, 2019, I contacted Miss Jade
20 Hofeldt, Sales Director of Jet Aviva. According to Miss Hofeldt, she had a buyer who
21 was interested in buying a Cessna Citation Mustang. Her office, utilizing Steinert
22 Printing, sent solicitation letters to all Cessna Citation Mustang owners asking if they
23 were interested in selling their aircraft. Miss Hofeldt stated that her office utilized a
24 subscription service called "JETNET" to obtain all current owners of the Cessna Citation
25 Mustang model. "JETNET" provided her current information on aircraft ownership,
26 owner records, contact information, recent sale activity etc. The information was
27 obtained from a combination of resources to include broker information, as well as FAA
28 records.

1 32. According to Miss Hofeldt, on May 30, 2019, her office sent a letter to
2 MICHELLE R. HUGHES, 153 SW 332nd Pl, Apt 3106, Federal Way, WA 98023,
3 because MICHELLE R. HUGHES was the “current owner” of Cessna Citation Mustang
4 registration number N102DS, serial no. 510-0095. Miss Hofeldt provided her email
5 address on the letter. On June 3, 2019, MICHELLE R. HUGHES responded back to
6 Miss Hofeldt via email address michelle44450@gmail.com, “My name is Michelle
7 Hughes and I am willing to sell. I have the Cessna Citation Mustang, N102DS. I am still
8 interested. How soon is the client interested in purchasing it? I can even do a Bill of sale.
9 I like to know how soon will I receive the funds? Do you mail me a check or do a direct
10 deposit? The plane isn't represented by a broker. I am asking for \$2.5 million. Sincerely,
11 Michelle Hughes.”

12 33. On June 9, 2019, Miss Hofeldt sent me an email with two attachments.
13 One attachment was a voicemail in which it appeared that MICHELLE R. HUGHES
14 wanted to sell the Citation Mustang, tail number N102DS. MICHELLE R. HUGHES left
15 a telephone number (253) 241-0723 for Miss Hofeldt to call back. The voicemail was
16 left on Ms. Hofeldt's phone at 12:01 AM on Sunday June 9, 2019.

CONCLUSION

LY TRAN
Special Agent
Homeland Security Investigations

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Based on the Complaint and Affidavit sworn to before me, and subscribed in my presence, the Court hereby finds that there is probable cause to believe that the defendant committed the offense set forth in the Complaint.

DATED THIS 12th day of June, 2019.

BRIAN A. TSUCHIDA
United States Magistrate Judge

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